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December 5, 1985

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WASHINGTON, D. C. 20006
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Mr. Kirk R. Macfarlane
Assistant Regional Counsel
U.S. Environmental Protection Agency
Region IV
345 Courtland Street
Atlanta, GA 30365

Re: Medley Site, Gaffney, South Carolina

Dear Mr. Macfarlane:

I am in receipt of your letter of December 2, 1985. In that letter you state that "it is incumbent on the Medley PRPs to get together quickly and present EPA with any settlement offers they wish to make." On November 18, I met with you on behalf of National Starch and requested that EPA provide National Starch with all of the information that it had relating to the identities of PRPs at the Medley site. To date, National Starch has communicated with three other PRPs, Milliken, Unisphere and Clyde Medley. As I indicated in our meeting on November 18, National Starch believes that there are other PRPs and we know that EPA has conducted an investigation at the site. Experience has shown that the only way to resolve a case of this nature is for the agency to identify all PRPs and provide an opportunity for them to meet and consider a joint resolution. In fact, the agency's settlement policy has had the practical effect of requiring this. As of the date of this letter I have received no information from you following our November 18 meeting.

I understand that it is the agency's policy that it is not required to bring an enforcement action against all of the potentially responsible parties involved in a site. However, if the agency is sincerely interested in a resolution of this matter without litigation, the agency should move forward in good faith to provide all information on all PRPs so as to encourage a fair settlement. Even if EPA can limit its litigation to "targets" it is unfair to limit settlement efforts to less than all PRPs.

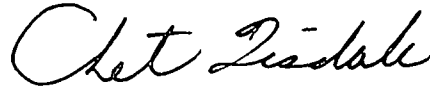
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I look forward to receiving additional information from you relating to EPA's investigation on PRPs. As we discussed on the 18th, I understand that there may be information developed by EPA that it considers to be enforcement sensitive. However, information relating to the identities of all PRPs should not be considered enforcement sensitive and clearly would be discoverable information in litigation. Since the agency is seeking to avoid litigation, I urge you to provide us with the information immediately.

Sincerely,

A handwritten signature in cursive script, reading "Chet Tisdale".

Charles H. Tisdale, Jr.

CHT/ljw

cc: Mr. G. Stephen Manning
Mr. Alex M. Samson, Jr.
Mr. John Mann
Mr. Robert D. Boyd